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Advertising Age[®]

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The International Newspaper of Marketing

Monday, July 16, 1984

FCC gets GOP's ad complaint

By MAURINE CHRISTOPHER

Telecasters around the country are waiting to see what an upcoming batch of commercials from the Democratic Congressional Campaign Committee will look like, now that an earlier generic spot satirizing the Reagan administration has been challenged by a conservative legal-watchdog group.

Milton Gross, chief of the fairness and political broadcasting branch of the Federal Communications Commission's enforcement division, won't give a clue as to when the FCC will take up the American Legal Foundation's claim that stations that carried the controversial ad should be subject to the commission's personal-attack rule.

"We may run the spot again, depending on our budget," said Mark Johnson, press secretary of the Democratic committee. "This complaint was filed two months after the spot ran in the spring. We don't take it too seriously."

Mr. Johnson said the spot ran in Washington to indicate to the media that the ethical troubles of the Reagan administration are a political issue in the current campaign. The spot satirizes the "new morality" of the Reagan administration, dealing with the well-publicized troubles of such figures as Charles Wick, James Watt and Ann Burford.

"Ronald Reagan says he's bringing a new morality to government, but look at the list of charges," a voiceover says over a smiling picture of Ronald

Reagan standing next to a flag. After pictures of several aides and officials, some of whom left their posts in a cloud of controversy, it winds up with the President on screen and the voiceover talking about the most "scandal-tainted officials that we've seen since Richard Nixon and Watergate."

It ends by recommending that voters solve the problem by voting Democratic this year.

It is the four Washington stations—WJLA-TV (ABC), WDVM-TV (CBS), WRC-TV (NBC) and independent WTTG—and not the committee that would feel the heat, should the FCC decide the long list of people mentioned in the commercial are entitled to respond under the personal-attack rule.

As the FCC's Mr. Gross noted, the rule specifically exempts attacks made by legally qualified candidates or their spokesmen on other candidates.

But he also noted that the petition by Michael McDonald, general counsel of the ALF, argues that, except for Ronald Reagan, the people whose integrity is questioned are not running for office. Besides those pictured, several others are merely named at the end of the ad.

If FCC should agree with Mr. McDonald's arguments, those who could ask for an opportunity to reply to Democratic charges include Edwin Meese, presidential aide and attorney general-designate; Central Intelligence Agency director William Casey, and Richard Allen, former national security adviser. #

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Request by)	
)	
The American Legal Foundation)	
)	
for a)	
)	
Declaratory Ruling that the)	Docket No.
Negative Political Advertisement)	
"Morality" and Other Similar)	
Ads that may be Aired)	
by the Democratic Congressional)	
Campaign Committee Constitute)	
a Personal Attack)	

I. INTRODUCTION

The American Legal Foundation (ALF or Foundation) hereby requests a Declaratory Ruling pursuant to Section 1.2 of the Commission's Rules and Regulations on the nature of the television advertisement "Morality," produced by John Franzen for the Democratic Congressional Campaign Committee (DCCC).^{1/} ALF will demonstrate below that this advertisement constitutes a personal attack on each of the persons mentioned, listed or shown therein and thus triggers certain broadcast licensee obligations under 47 C.F.R. 1920, et seq. Accordingly, the Foundation believes that a Commission declaration to this effect will help to clarify broadcast licensee obligations should they be requested to air

^{1/} Section 1.2 provides: "The Commission may, in accordance with Section 5(d) of the Administrative Procedure Act, on motion or on its own motion issue a declaratory ruling terminating a controversy or removing uncertainty."
(47 C.F.R., Part 1, para. 50)

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this or similar negative political advertisements during the upcoming 1984 Presidential election campaign.

II. INTERESTS OF THE AMERICAN LEGAL FOUNDATION

The American Legal Foundation is a nonprofit, nonpartisan public interest law center organized and existing under the laws of the District of Columbia for the purpose of engaging in litigation and the administrative process in matters relating to the media.^{2/} ALF was founded in 1980 and currently represents the interests of over 40,000 members and supporters nationwide.

ALF engages in a wide variety of work. (See Attachment A.) Among other activities, the Foundation has an institutional interest in seeing to it that the media are held fully accountable for any defamatory activities they engage in. Earlier this year, for example, ALF announced the opening of a Libel Prosecution Resource Center (LPRC) dedicated to the support and vindication of the reputations of individuals injured by libelous journalistic practices. At present, the LPRC is establishing a national network of skilled trial attorneys and a resource bank of information aimed at defending the rights of media victims. (See Attachment B.)

During the spring of 1984, ALF was in contact with persons who indicated that they believed they had been personally attacked during a broadcast of the so-called "Morality"

^{2/} The Foundation wishes to emphasize that it is an independent nonpartisan legal center unaffiliated with any local or national political party.

advertisement. Pursuant to these conversations, in order to clarify the obligations of broadcast licensees as regards future airing of this or similar advertisements, and in furtherance of the general public interest, ALF now institutes the present request for a Declaratory Ruling.

III. ANALYSIS

A. General Licensee Obligations

Under specified circumstances, a broadcast licensee must offer to make a reasonable amount of broadcast time available to those who have a view different from that which already has been expressed on his or her station. Red Lion Broadcasting Co. v. FCC, 395 U.S. 367, 391 (1969). Congress has codified its intent on this matter in the Fairness Doctrine, Pub. L. No. 416, section 315 (1934 as amended); 47 C.F.R. 73.1910. When the proponent of a particular side of a controversial issue of public importance gains access to the public over the airwaves, the opponent of that particular point of view must be afforded the reasonable opportunity to present his or her views over those same airwaves. 47 C.F.R. 73.1910; FCC Public Notice, "The Fairness Doctrine and the Public Interest Standard," 39 F. Reg. 26372 (1983).

B. Specific Licensee Requirements Subsequent to the Broadcast of a Personal Attack

If, during the presentation of views on a controversial issue of public importance, an attack is made upon the honesty, character, integrity or like personal qualities of an identified

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person or group, the broadcast licensee who aired the personal attack must comply with certain administrative requirements. 47 C.F.R. 1920, et seq. The basic principle underlying the licensee's responsibility in this circumstance is the right of the public to have access to a balanced presentation of information on issues of public importance. Columbia Broadcasting System, Inc. v. Democratic National Committee, 412 U.S. 94, 112 (1973); Red Lion, supra at 390.

If indeed a personal attack occurs, the licensee must follow certain mandatory procedures. He is obligated to: (1) notify the person attacked of the date, time and identification of the attack; (2) send the person attacked a script, tape or written summary of the attack; and (3) offer the person attacked a reasonable opportunity to respond over the licensee's facilities. 47 C.F.R. 1920(a). These procedures must be carried out within one week of the attack. Id.

C. Negative Advertising

It is widely recognized that radio and television have had an enormous impact on American life. As one court noted:

The technological and cultural changes connected to the current preeminence of the broadcast media as our primary means of communication...are...striking. The soap box orator and the leafleter are becoming almost obsolescent; their Saturday afternoon audiences have increasingly moved indoors in front of their television sets.

Business Executives' Move for Vietnam Peace v. FCC, 450 F.2d 642, 653 (D.C. Cir. 1971), rev'd on other grounds sub nom. CBS, Inc. v. Democratic Nat'l Comm., 412 U.S. 94 (1973).

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The pervasiveness of television alone cannot be overstated. In the 1980's about 98 percent of all American homes have at least one television set. Statistical Abstract of the United States, 1979 (Washington, D.C.: Bureau of the Census, 1979), Table 986, at 587. Moreover, American children begin watching television before they can walk and, by the time they finish high school, have spent less than 12,000 hours in front of a teacher and more than 22,000 hours in front of a television set. See A. Ranney, Channels of Power: The Impact of Television on American Politics, (1983) at 4.

These and similar other figures amply demonstrate that the broadcast media have become a significant factor in American life. In fact, it would not be too much of an overstatement to suggest that information received from the media constitutes "reality" for a great many people. Accordingly, both political parties have an obligation throughout the upcoming Presidential campaign to provide political information to the public which is accurate and which is not so negative as to undermine further the already low esteem in which the public holds the political process. The continued negative portrayal of the "other side" by one political party for narrow partisan gains can only serve to alienate the electorate, thereby contributing to a decrease in voter turnout and a concomitant increase in public cynicism.^{3/} Broadcast

^{3/} ALF testified on these concerns to the Democratic National Platform Committee at hearings that were held in Washington, D.C. on June 11, 1984.

licensee compliance with the personal attack doctrine is one way, ALF feels, to counter the deleterious effects of negative political advertising.

D. "Morality" Is A Personal Attack

Even the most cursory examination of the advertisement at issue shows that it constitutes a personal attack on each of those persons mentioned, listed or shown, especially upon the character of the President of the United States.^{4/} The statements in the advertisement clearly relate to each person's honesty, character, integrity or like personal qualities.

The Commission has previously stated that remarks which state or imply that an individual has committed acts which are 'by definition, criminal or dishonest' constitute personal attacks. Rev. Paul E. Driscoll, 40 FCC 2d 448, 450 [27 RR 2d 1138] (1973), (Broadcast Bureau Ruling). The same is true of accusations of illegal conduct which imply 'improper or corrupt motives on the part of the attacked party.'

Educational Broadcasting Corp., 40 RR 2d 1676 (1977).

A clear example of such an accusation can be found, for example, in the fifth slide of the so-called "Morality" advertisement which displays a photograph of former National Security Advisor Richard V. Allen with his name captioned across the bottom of the frame. The announcer's voice over simultaneously states: "Secret gifts."

This innuendo of moral turpitude is obvious. Mr. Allen's honesty, character and integrity are severely impugned. The

^{4/} A complete transcript of the advertisement is set out in Attachment C.

advertisement does not state that Mr. Allen was completely exonerated of any wrongdoing when he diplomatically accepted certain gifts and intercepted a cash gift intended for Nancy Reagan, but leaves viewers with the notion that Mr. Allen committed a dishonest act or acted with corrupt motives. This defamatory presentation is patently untrue and therefore attacks Mr. Allen's honesty and integrity. See Report of the Attorney General Exonerating Allen, No. 81-1 (filed December 22, 1981 in the U.S. Ct. App. for D.C. Cir.). Other persons in the advertisement are subject to similar attacks which, through accusations of wrongdoing, are intended to put the viewer on notice that the moral character of the person attacked is suspect.

This advertisement is thus a classic example of a personal attack: its tone, emphasis and style are calculated to alert viewers to alleged character flaws of the President and the other persons attacked. It tends to expose each named individual to public shame, contempt and disgrace. Accordingly, it falls squarely within the parameters of the personal attack doctrine as set out in 47 C.F.R. 1920, supra at 3-4.

E. "Morality" Falls Under No Exemption

Subsections b(1)-(4) of provision 73.1920 detail several exemptions under the personal attack rule. Personal attacks made under these exceptions do not trigger the obligations mentioned if they are: (1) made on foreign groups or foreign public officials; (2) made by legally qualified candidates; (3) made by the authorized spokespersons of legally qualified candidates or those

associated with legally qualified candidates in the campaign; or
 (4) made during bona fide newscasts or events. 47 C.F.R. 73.1920
 (b) (1)-(4).

"Morality" is a paid political advertisement produced under the auspices of and sponsored for broadcast by the Democratic Congressional Campaign Committee (DCCC). Quite obviously, it attacks no foreign group or person, nor is it the presentation of any legally qualified candidate, nor was it broadcast during a bona fide newscast or event. ALF also contends that is is not a statement made by an entity associated with any legally qualified candidate in the campaign.

1. "Morality" Was Sponsored by An Entity Not Associated With Any Legally Qualified Candidate for President

The advertisement's sponsor, the Democratic Congressional Campaign Committee, is a national party committee organized to raise and distribute money to Democratic contenders in House of Representatives races only.^{5/} It is not in the business of raising funds to support Democratic Presidential candidates. Therefore, DCCC does not qualify as an entity "associated with" a legally qualified candidate for president under 47 C.F.R. 1920 (b) (3), nor as "a political committee established solely for the

^{5/} "Morality" is directed at a legally qualified candidate for President, Ronald Reagan. Arguably, if "Morality" were aimed at a candidate for the House of Representatives, it might not trigger the personal attack doctrine. Since the ad is aimed at the President, however, no such exemption applies.

purpose of joint fundraising [for] such candidates as an authorized committee." 2 USC 432(e)(3)(4)(ii); 11 C.F.R. 102.13 (1983).

It is also important to note that when this advertisement was initially aired (see Attachment D), there was no legally qualified candidate for the Democratic Party for the office of President. There will be no such legally qualified candidate until, at the minimum, July 20, 1984, when the Democratic Party convenes in San Francisco. Therefore, the DCCC had no legally qualified candidate to be associated with or authorized by when this advertisement was aired.

2. "Morality" Falls Under No
Personal Attack Exemption

Since this advertisement constitutes a personal attack upon a legally qualified candidate for President, and since it was made by an entity not associated with any legally qualified candidate for the Presidency, it does not fall under the exemptions set forth in 47 C.F.R. 1920 (b)(3). Therefore, "Morality" triggers the personal attack doctrine and all attendant responsibilities for the broadcaster who decides to air the ad. ALF contends that, subsequent to any future airings, those licensees who broadcast this advertisement or any similar negative political advertisement,^{6/} must comply with the notice and response requirements.

^{6/} It must be emphasized once again that ALF is concerned not just with "Morality" but also with similar negative political advertising likely to be run this election year by entities such as the DCCC.

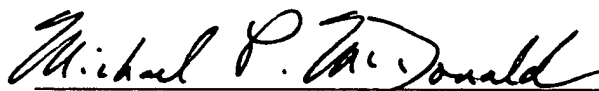
ALF asks the Commission to so rule in order to alleviate any ambiguity which might surround the perception of the advertisement of the responsibilities which accompany its broadcast.^{7/}

IV. CONCLUSION AND REQUESTED RELIEF

ALF has demonstrated that "Morality" is a calculated personal attack on the character of the President of the United States and each of the other persons mentioned, listed or shown in the advertisement. ALF asks for a Commission ruling to this effect to insure that broadcasters are aware of their proper responsibilities upon airing this or similar advertisements. Moreover, such a ruling would serve the public interest by allowing individuals whose reputations are impugned the chance to offer a balanced presentation to the broadcast audience in question.

For the foregoing reasons, ALF asks the Commission to declare that the so-called "Morality" ad and similar negative television advertisements constitute a personal attack and thus trigger the personal attack doctrine.

Respectfully submitted,



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General Counsel

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^{7/}

On June 27, 1984, ALF forwarded letters to CBS, ABC, NBC and their affiliates in the nation's ten largest cities outlining attendant responsibilities accompanying the airing of the "Morality" ad. A copy of a representative letter is set forth in Attachment E.

ATTACHMENT A

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The Washington Times

Friday, March 9, 1984

Q&A: Legal group hits media distortion and error

Michael P. McDonald of the American Legal Foundation on media-related issues.

The American Legal Foundation has taken aim at the most powerful institution in America — the press. Michael P. McDonald, the Foundation's general counsel, was interviewed recently by national staff writer Tom Diaz.

Q: What is the American Legal Foundation?

A: The American Legal Foundation, founded in 1980, is a conservative public interest law firm that deals exclusively with media-related issues and matters of concern to the general public.

Q: What do you include when you say "media"?

A: Generally, I'm talking about the press and the networks. Most of our work is done in connection with the major news media outlets: the three networks, The New York Times, The Washington Post, AP and UPI.

Q: Why do we need a public interest law firm? The Federal Communications Commission says it exists for the public interest.

A: The ALF's agenda encompasses some of the work of the FCC, but it goes beyond it. We regularly appear before the FCC in licensing renewal procedures and administrative actions to ease the regulatory burden which the FCC has imposed on broadcasters. In addition, we file complaints at the FCC, we bring matters of media bias to the Commission's attention which otherwise would go unnoticed, and we attempt to have them take action on instances of media bias or distortion in news programming.

In addition to the regulatory work at the Commission we also do work in court. We've started to get into the area of libel litigation.

Q: Let's start with the media bias. What is the problem and what do you hope to do?

A: The problem as we see it is that there is a media elite dominant in the nature of news organizations. It both unintentionally and, at times, intentionally not only slants coverage of news events, but also — and this is a bit more insidious — sets the agenda for the presentation of news items.

Q: How would you define the "media elite"?

A: I think the ground-breaking work on this has been done by Linda and Robert Lichter of George Washington University. The Lichters have done a number of sociological studies based on interviews with major media reporters and news editors. Their conclusions, which are fairly well documented, are that by and large the media have a liberal outlook and that this outlook is foisted upon the public through presentation of news programs and in the way they go about selecting what news to air.

The Lichter study demonstrates that in 1972, during the Nixon landslide re-election, more than 81 percent of news figures they interviewed voted for George McGovern. In the long-term trend, the Lichters have shown that in the last 16 years, the major media figures voted overwhelmingly for Democratic as opposed to Republican candidates. More than 50 percent of the people surveyed by the Lichters believe in some strong form of welfare capitalism. It goes on and on down the line.

These people generally are predominantly white males, from Northeast urban centers, from well-to-do families. They constitute a fairly insular class of their own which reinforces itself and its values. For example, The New York Times runs an editorial in the morning on something criticizing the Reagan administration and it's picked up later by the evening news broadcasts. And at times, it's a conscious attempt, we feel, by the news media to take stands at odds with conservative points of view. At times, it's unintentional.

To give an example, there was the CBS five-part series in 1981 on the defense buildup by the Reagan administration. They took an openly adversarial posture toward what President Reagan was trying to achieve in the defense buildup and essentially tried to trash it.

Then we have other examples that are unintentional, where the opposite point of view simply is not presented. For example, if ALF and other conservative organizations hadn't been involved in the whole "Day After" brouhaha, I don't think we would have seen the Viewpoint segment that aired afterward, which was a fairly conservative panel and counterbalanced some of the more blatant implications in the film.

Q: But your critics would say that people are entitled to have their own points of view, even reporters and television anchormen.

A: There was an AP correspondent in 1840 named John Gobright who said it best: "My job is just to report the facts no matter how dry they may be." The media try to have it both ways. On the one hand they like to take an adversarial posture, although it is curious that they're only adversarial in some ways and not in others.

One of the most egregious examples that I can think of recently has been the treatment of the Reagan administration in the area of civil rights. Take the Bob Jones University case [decided last year by the Supreme Court]. The position of the Justice Department was essentially that it should not be up to organizations like the Internal Revenue Service to determine what public policy is, and thereby take away the tax exempt status of certain religious organizations and universities. But every time I read or hear about the case in the press, it's always presented as if the administration deliberately wanted to give the tax exemption to a school that racially discriminated against minorities. That wasn't the case at all. It was a constitutional question and the ramifications of that have been distorted and thrown out of all proportion.

Q: Assuming it's true that members of the press have a certain philosophical and intellectual bias which they express in their coverage of the news and the way they present the news, how do you combat that?

A: You can combat it on a number of different levels. The media are sensitive to criticisms that they're not being fair. One of the things we do is to alert the relevant authorities within the news organizations about the instances of bias that have come to our attention and see if they'll take action. Sometimes they will. So you bring it to the attention of the media and hope for corrective action. That won't necessarily get you anywhere.

If it doesn't, you can go public with it. We try to perform a public service function, taking our case to the public by writing articles, editorials and op-ed pieces on instances of media distortion.

In addition to that, there are administrative channels we can pursue. If we could get the FCC to enforce regulations that it has on the books now about creating spontaneous news events or planning the news, you would see a revolution in bringing about greater objectivity.

Within the last year, we filed four complaints — four massive complaints — at the FCC on instances of media distortion. One complaint over the CBS documentary, "Vietnam Deception: The Uncounted Enemy," which accused Gen. William Westmoreland of falsifying enemy troop figures. We filed a second complaint against the NBC program "Monitor" for broadcasting a segment on Jim Watt which alleged incorrectly that he was not enforcing strip mining laws. We filed a complaint against a CBS program, "Our Times With Bill Moyers," for distorting the combat reliability of the cruise missile

and M-1 tank. And we filed a complaint at the FCC against the "60 Minutes" program for a segment that Dan Rather did on Dr. Carl Galloway, about insurance fraud. They had a libel trial on that recently.

Q: That Dan Rather won...?

A: Yes, they won that. But to the best of my knowledge, these are the only types of complaints that have been filed that are working within the regulatory laws that exist now to get the FCC to take action.

Q: In your view, what action could the FCC take?

A: All the complaints are pending now and we expect a determination within the next few months, beginning with the Westmoreland complaint. The FCC, we feel, should launch an investigation into production of these so-called documentaries to see exactly what's going on. We've provided the FCC with evidence which indicates that witnesses are coached and that news events which appear spontaneous to the viewer are actually staged. We think reporters should have to get at the facts. They come out with a preconceived thesis and then try to justify that thesis. The case law that we've researched indicates that in these types of instances, the FCC plainly has the authority to act to investigate the matter, and if the evidence warrants it, revoke licenses for lack of character qualifications, impose other sanctions, or place conditions on the news organizations. We're interested in seeing if we can move the FCC or whether it will take a hands-off policy.

We've also just created a Libel Prosecution Resource Center for media victims. We're contacting and setting up a network of plaintiffs' attorneys in the libel area across the country. We are also collecting information — cases, articles, treatises, states' statutes in the libel and defamation area. We're going to throw open the doors of the center to people who feel that they have been assaulted by news organizations, who feel that they are media victims, and would like to find information about how they can vindicate their rights in court. The Foundation would be more or less a clearinghouse for this information. At the same time, through the network of lawyers, we hope to operate as a referral service to people across the country.

Q: In lay terms, could you say generally what libel is in the context of the media, and how do you see it as a problem?

A: "Libel" is an attack on the integrity of a person's character, which injures his reputation in the eyes of the people that he deals with in his livelihood. It's an injury to something that's intangible — one's reputation. To quote Shakespeare, "He who steals my wallet, steals trash. He who steals my good name, steals everything." It's part of the common law, and it's growing, it's becoming an explosive field. Television docudramas have helped stimulate an increase in libel litigation. CBS' "60 Minutes" alone has had more than 150 libel actions filed against it by individuals in the dozen or so years it's been on the air.

Q: Do you know what their success rate is?

A: I think they win or settle probably a good deal of them but I don't have any accurate figures on it. The law has a very high standard about what constitutes libel because courts have wanted to protect freedom of expression.

Q: Are there other public interest media groups?

A: The area has been occupied exclusively by liberal groups until the creation of American Legal Foundation. There are many special interest groups that have all been in operation for quite some time now, working at the FCC and in the courts to promote their own narrow special interest.

ATTACHMENT B

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JUNE 19, 1984
NATIONAL LAW JOURNAL

Conservative Firm to Aid 'Media Victims' in Court

WASHINGTON — A conservative public-interest law firm here is establishing a Libel Prosecution Resource Center to help "media victims" sue the press.

Michael P. McDonald, general counsel of the American Legal Foundation, said the center, which will be in operation by the end of the summer, will offer a collection of briefs, complaints and information on libel cases to aid in the defense of "reputational interests of media victims."

In addition, the ALF is putting together a nationwide network of plaintiffs' attorneys skilled in libel to assist citizens who want to sue. Mr. McDonald said the network now has attorneys in 15 to 20 states.

The center is similar in concept to the New York-based Libel Defense Resource Center, which was founded in the mid-1970s, a time when courts began to be more hostile to the media after a decade of favorable rulings.

At present, Mr. McDonald said his group is not directly involved in any cases, but is looking at some possible "precedent setting" ones.

The ALF also has filed a number of amicus briefs in libel cases, said Mr. McDonald, noting that it has filed in the pending appeal in *Tavoulareas v. Washington Post Co.*, 83-1604, in the U.S. Circuit Court of Appeals here. In that case, Mobil executive William P. Tavoulareas is appealing the ruling of a U.S. District judge here that the Washington Post did not act with actual malice in reporting that Mr. Tavoulareas "set up" his son in a Mobil-connected business.

The pattern in the Tavoulareas case is not unusual. First Amendment expert Floyd Abrams of New York's Cahill Gordon & Reindel noted recently that while 89 percent of libel cases are decided against the media, 70 percent are reversed on appeal.

Henry Kaufman, general counsel of the Libel Defense Resource Center, predicts that the trend in libel cases will soon swing back in favor of the media. He suggested that Mr. McDonald's group will find that libel cases will cease to be "fruitful."

Mr. McDonald disagreed. "I don't think so. I believe the courts will continue to balance the competing interests" of press freedom and individual privacy.

Mr. Abrams, who was critical of what he called "right-wing media watchdog groups" such as ALF, agreed with Mr. McDonald's assessment that there will be more suits against the media. Libel cases, he said, are "the thing to do."

ATTACHMENT C

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Transcript - DCCC

Title: "Morality" (30 sec.)

Date: 3/23/84

Producer: John Franzen

Picture of Ronald Reagan
Announcer Voice Over:

"Ronald Reagan - he said he'd bring a new morality to government. But look at the list of charges:"

Picture of Edwin Meese with name at bottom
Announcer Voice Over:

"Sweetheart loans"

Picture of William Casey with name at bottom
Announcer Voice Over:

"Hidden financial deals"

Picture of Richard Nimmo with name at bottom
Announcer Voice Over:

"Abuse of privilege"

Picture of Richard Allen with name at bottom
Announcer Voice Over:

"Secret gifts"

Picture of Thomas Reed with name at bottom
Announcer Voice Over:

"Insider stock trading"

Picture of James Watt with name at bottom
Announcer Voice Over:

"Mineral rights giveaway"

Picture of Charles Wick with name at bottom
Announcer Voice Over:

"Black list"

Picture of Rita Lavelle with name at bottom
Announcer Voice Over:

"Purgery"

Picture of Ronald Reagan with names:
Announcer Voice Over:

"More scandal-tainted officials
than we've seen since Richard
Nixon and Watergate."

Edwin Meese
William Casey
Richard Nimmo
Richard Allen
Thomas Reed
James Watt
Charles Wick
Rita Lavelle
John Crowell, Jr.
Guy Fiske
Ann Burford
James Malone
Emanuel Savas
Arthur Hull Hayes
Donald Hovde
James Sanderson

"This is moral leadership?"

Blue Screen with words and
Announcer Voice Over:

"Vote Democratic."

ATTACHMENT D

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Although it was impossible for the Foundation to obtain a complete listing of the airings of the television advertisement, "Morality," set forth below is a partial listing.

PARTIAL SCHEDULE OF AIRING OF "MORALITY"

Sponsored by the Democratic Congressional Campaign Committee

1. WJLA-TV, Washington, D.C. Channel 7 (ABC O&O)

3 showings: April 2, 3, 4, 1984

2. WRC-TV, Washington, D.C. Channel 4 (NBC O&O)

4 showings: March 31 - April 7, 1984

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ATTACHMENT E

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